

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Robert N. Michaelson, as Trustee of the	)	
Appleseed's Litigation Trust,	)	
	)	Civil Action No. 11-807 JEI
Plaintiff,	)	
v.	)	
	)	
Jeffrey D. Farmer, et al.,	)	
	)	
Defendants.	)	Bankruptcy Case No. 11-10160 KG
	)	ADV. Pro. 11-51847 KG

**MOTION AND ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission *pro hac vice* of Sander Bak of Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, 46th Floor, New York, New York 10005, to represent Golden Gate Private Equity, Inc.; Golden Gate Capital Management II, LLC; GGC Administration, LLC; Orchard Brands Corporation (formally known as Appleseed's Topco, Inc.); Orchard Brands Topco LLC; Catalog Holdings, LLC; Catalog Holdings, LLC – Series B (Draper's); Catalog Holdings, LLC – Series C (Appleseed's); Catalog Holdings, LLC – Series D (NTO); Catalog Holdings, LLC – Series E (Haband); Golden Gate Capital Investment Fund II, LP; Golden Gate Capital Investment Fund II (AI), LP; Golden Gate Capital Associates II-QP, LLC; Golden Gate Capital Associates II-AI, LLC; CCG AV, LLC; CCG AV, LLC – Series C (GGC Co-Invest); CCG AV, LLC – Series I (Bain); CCG AV, LLC – Series K (K&E); CCG AV, LLC – Series K; Joshua Olshansky, Stefan Kaluzny, Geralynn Madonna and Jim Brewster (the "Golden Gate Defendants"), in this matter.

Signed: \_\_\_\_\_

Mark D. Collins (No. 2981)

Robert J. Stearn, Jr. (No. 2915)

Drew G. Sloan (No. 5069)

RICHARDS, LAYTON & FINGER, P.A.

One Rodney Square

920 North King Street

Wilmington, Delaware 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

Email: collins@rlf.com

stearn@rlf.com

sloan@rlf.com

Attorney for: Golden Gate Defendants

Dated: October 14, 2011

**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission pro hac vice is granted.

Date: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Joseph E. Irenas  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED PRO HAC VICE**

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of New York and New Jersey and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for District Court Fund effective July 23, 2009, I further certify that the annual fee of \$25.00 has been previously paid to the Clerk of Court for District Court in connection with my pro hac vice admission to the United States Bankruptcy Court for the District of Delaware.

Signed: 

Date: October 11, 2011

Sander Bak  
Milbank, Tweed, Hadley & McCloy LLP  
1 Chase Manhattan Plaza  
46th Floor  
New York, New York 10005  
Telephone: (212) 530-5125  
Email: sbak@milbank.com